

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO: 2:19-cr-53
	:	
v.	:	CHIEF JUDGE EDMUND A. SARGUS, JR.
	:	
ANDREW K. MITCHELL,	:	
	:	
Defendant.	:	

**JOINT MOTION OF DEFENDANT AND U.S. GOVERNMENT
TO CONTINUE ALL TRIAL DEADLINES**

Now come Defendant, Andrew K. Mitchell, by and through counsel Mark C. Collins, and Assistant U.S. Attorney Jessica H. Kim, hereby request a continuance of all deadlines, as well as the Defendant continues to waive time for said request. The reasons for said request are more fully stated in the attached Memorandum in Support.

Respectfully submitted,

/s/ Mark C. Collins
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Attorneys for Defendant Andrew K. Mitchell

MEMORANDUM IN SUPPORT

Now come the Defendant, Andrew K. Mitchell, by and through Counsel and Assistant U.S. Attorney Jessica H. Kim, and hereby request a continuance of all deadlines. As the Court is aware, Defense Counsel has been retained on Mr. Mitchell's state case; 19 CR 1662, a murder charge, set in front of the Honorable Judge Young, in the Common Pleas Court of Franklin County, as well as the above styled case. It is Counsel's belief that it is in Mr. Mitchell's best interest to focus on one matter at a time; that being the murder charge in the state case. Defendant by and through Counsel hereby again waives speedy trial rights in the above style case. Said request is consented and joined by Assistant U.S. Attorney Jessica H. Kim.

Respectfully submitted,

/s/ Mark C. Collins

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Attorneys for Defendant Andrew K. Mitchell

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2019, I electronically filed the Motion to Continue with Chief Judge Edmund A. Sargus, Jr., using the CM/ECF System, which will send notification of such filing to the following: Jessica H. Kim, Esq., and Kevin W. Kelley, Esq.

/s/ Mark C. Collins

MARK C. COLLINS (0061207)